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PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

ENVIREX INC.
(FORMER REXNORD - CORPORATE MANUFACTURING)
MADISON, INDIANA 47250
IND 006 374 722

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	IND 006 374 722
Date Prepared	:	November 11, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IN4S
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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and areas of concern (AOC) at the Envirex Inc. (Envirex) (Former Rexnord - Corporate Manufacturing) facility in Madison, Jefferson County, Indiana. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

Envirex is a steel fabrication facility that produces parts and equipment related to road construction and wastewater treatment operations. The equipment manufactured at the facility includes rotating biological contactors, travelling water screens, sludge thickeners, elevator casings, bucket and slat conveyors, and road paving equipment. Envirex has operated at its current location since 1958 and currently employs 155 people. The facility occupies 92 acres in an industrial, commercial, and residential area.

Envirex generates both hazardous and nonhazardous wastes during its manufacturing operations. Hazardous wastes generated at the facility include paint residue and thinner material (F003, F005, and D001), still bottoms (F003, F005, and D001), spent solvents (F002 and D001), and paint filter wastes (F003, F005, and D001). These wastes are generated during spray painting and equipment cleanup operations. Nonhazardous particulate emission wastes are generated during shot blast operations in the manufacturing area.

Prior to the construction of the facility in 1958, the land was used for agricultural purposes. The facility originally operated as the Chainbelt Company. The facility changed its name to Rex Chainbelt Company in 1964, and then to Rexnord - Construction Machinery Division in 1973. In 1987, Banner Industries acquired the facility and changed its name to Rexnord, Inc. - Corporate Manufacturing. The facility changed its name to Envirex - Banner Industries in 1989. In 1990, Northwest Water Group PLC acquired the facility and changed its name to Envirex, Inc. Before 1990, the facility was primarily involved in fabrication of heavy steel equipment related to road construction and mining operations. Since 1990, the facility started manufacturing equipment related to wastewater treatment facilities, in addition to some road construction equipment.

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Rexnord submitted a Notification of Hazardous Waste Activity form to EPA on July 15, 1980. Rexnord submitted a RCRA Part A permit application on August 16, 1980. This application listed container storage (S01) of 7,040 gallons of F017 wastes. In 1982, EPA delisted the F017 code. Rexnord resubmitted a Part A permit application on December 9, 1982. This application reclassified the wastes as F002 and F005 and listed an estimated 17,941 pounds each of these wastes per year. In 1988, Envirex closed its S01 container storage unit, the Former Container Storage Area (SWMU 4). Indiana Department of Environmental Management approved the closure in August 1988. The facility's current regulatory status is that of a large-quantity generator of hazardous waste. The facility has two air permits for its paint spray booth and shot blast operations. The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit for its stormwater and wastewater discharge. The facility discharges its sanitary and industrial wastewater, and stormwater to the City of Madison Water and Sewage Department. There has been no CERCLA activity at the site.

The PA/VSI identified the following six SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Satellite Accumulation Area
2. Steam Distillation Unit
3. New Container Storage Area
4. Former Container Storage Area
5. North Baghouse
6. South Baghouse

Area of Concern:

1. Underground Storage Tanks

There have been no documented releases from the facility in the past. The potential for release of hazardous constituents to ground water, surface water, air, and on-site soils is low. The Satellite Accumulation Area (SWMU 1) is located inside the building on a concrete floor. The Steam Distillation Unit (SWMU 2) is currently inactive. However, a facility representative indicated that SWMU 2 will be reactivated in August 1992. The Former Container Storage Area (SWMU 4) is no longer used to store wastes. The New Container Storage Area (SWMU 3) did not have secondary containment. The North Baghouse (SWMU 5) and South Baghouse (SWMU 6) are enclosed in a steel collector housing. These baghouses are used for collection of nonhazardous steel metal slag particulate emissions from shot blast operations. During the inspection, PRC observed no evidence of releases from these units.

Envirex used one 5,000 gallon and two 1,000-gallon Underground Storage Tanks (UST) (AOC 1) to store petroleum products such as gasoline, diesel fuel, and fuel oil. These USTs were removed in 1988. According to facility representative, no contamination was observed during the tank removal operations. Envirex submitted a tank removal report to IDEM, and has not received any response as of this date.

Receptors of potential releases at the facility include Envirex personnel and residents of the Madison area. The facility is secured by a 6-foot chain-link fence with three strands of barbed wire, limiting access to the potential receptors. Ground water in the area is used as an industrial, agricultural, municipal, and private water supply. The city of Madison derives it public water supply from deep wells located along the Ohio River. The nearest residential drinking water well is located 1-mile north of the facility. It is unknown if the well is upgradient or downgradient of the facility. The nearest major surface water body, Big Clifty Creek, is located 1.5 miles southwest of the facility. Big Clifty Creek is used for recreation. The Ohio River is located 3 miles south of the facility, and is used for agriculture, commercial, industrial, recreation, and public water supply. The facility is not located in a sensitive environment. The nearest sensitive environment, Clifty Falls State Park, is located 1.5 miles southwest of the facility. Several wetland areas, less than 0.5 acres, are located within 3 miles of the facility. The exact location of these areas are not determined.

PRC recommends that Envirex provide secondary containment in the New Container Storage Area (SWMU 3) to preclude potential releases to on-site soils. No further action is recommended for the remaining SWMUs identified at the facility. Also, PRC recommends that Envirex follow up and obtain a response from IDEM as to whether further action is required at the Underground Storage Tanks (AOC 1).

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Envirex Inc. (Envirex) (former Rexnord - Corporate Manufacturing) facility (EPA Identification No. IND 006 374 722) in Madison, Jefferson County, Indiana. The PA was completed on June 13, 1992. PRC gathered and reviewed information from the Indiana Department of Environmental Management (IDEM), Indiana Department of Natural Resources (IDNR), U.S. Geological Survey (USGS), U.S. Department of Agriculture (USDA), and from EPA Region 5 RCRA files. The VSI was conducted on June 17, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified six SWMUs and an AOC at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and nine inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

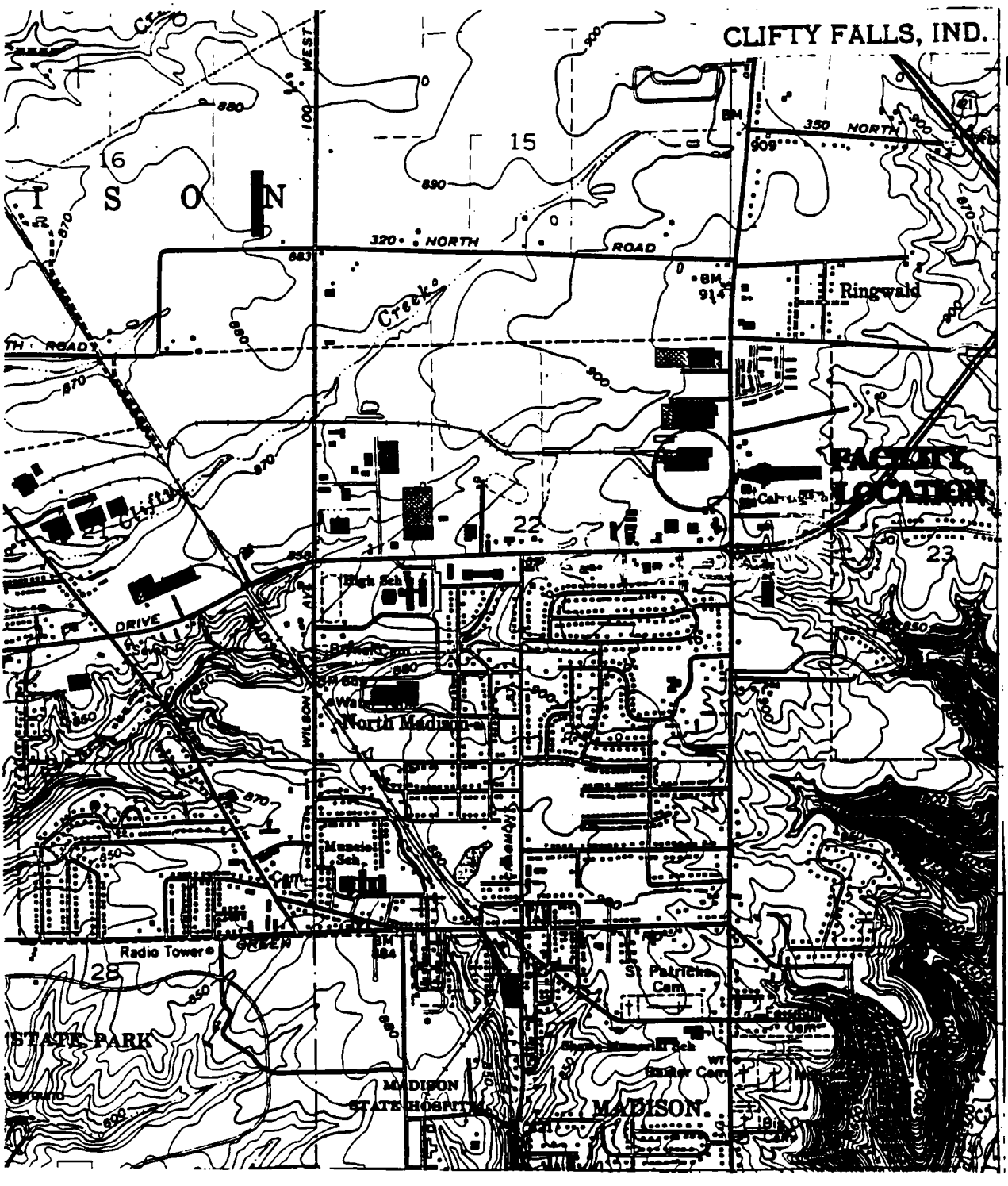
The Envirex facility is located at 2753 Michigan Road in Madison, Jefferson County, Indiana. Madison is a small town located 100 miles south of Indianapolis. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 38°45'00" N and longitude 85°22'30" W). The facility occupies 92 acres in an industrial, commercial, and residential area. The facility is bordered to the north by Reliance Electrical Industries, on the west and south by undeveloped land, and on the east by residential and commercial properties.

2.2 FACILITY OPERATIONS

Envirex is a steel fabrication facility that manufactures parts and equipment related to road construction and wastewater treatment operations. Equipment manufactured at the facility includes rotating biological contactors, travelling water screens, sludge thickeners, elevator casings, bucket and slat conveyors, and road paving equipment. Envirex has operated at its current location since 1958 and currently employs 155 people (Envirex, 1992). The facility uses approximately one-half the total area for its operations. It consists of a manufacturing building, warehouse, and paint shed. All the facility operations are carried out in the manufacturing building of approximately 154,870 square feet. The warehouse and paint shed are located north of the manufacturing building.

Envirex generates both hazardous and non-hazardous wastes during its manufacturing operations. Hazardous wastes, such as paint residue and thinner material wastes (F003, F005, and D001), still bottoms (F003, F005 and D001), spent solvents (F002 and D001), and spent paint filter wastes (F003, F005, and D001) are generated during spray painting and clean up operations. Nonhazardous particulate emission wastes are generated during shot blast operations. Solid wastes generated by facility operations and the SWMUs in which they are managed are discussed in detail in Section 2.3. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2.

Raw materials, such as paints and thinners, are stored in a metal paint shed located in the



SCALE 1:24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE 1"=2,000'

QUADRANGLE LOCATION

SOURCE: MODIFIED FROM USGS, 1980

ENVIREX, INC.
MADISON, INDIANA

FIGURE 1
FACILITY LOCATION

ENVIRONMENTAL MANAGEMENT, INC.

TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Satellite Accumulation Area	No	Active
2	Steam Distillation Unit	No	Inactive[b]
3	New Container Storage Area	No	Active
4	Former Container Storage Area	Yes	Closed, IDEM approved closure in 1988. Currently inactive.
5	North Baghouse	No	Active
6	South Baghouse	No	Active

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

[b] The facility intends to reactivate this unit in August 1992.

northern portion of the facility. Finished goods are stored in an open area to the south of the maintenance building.

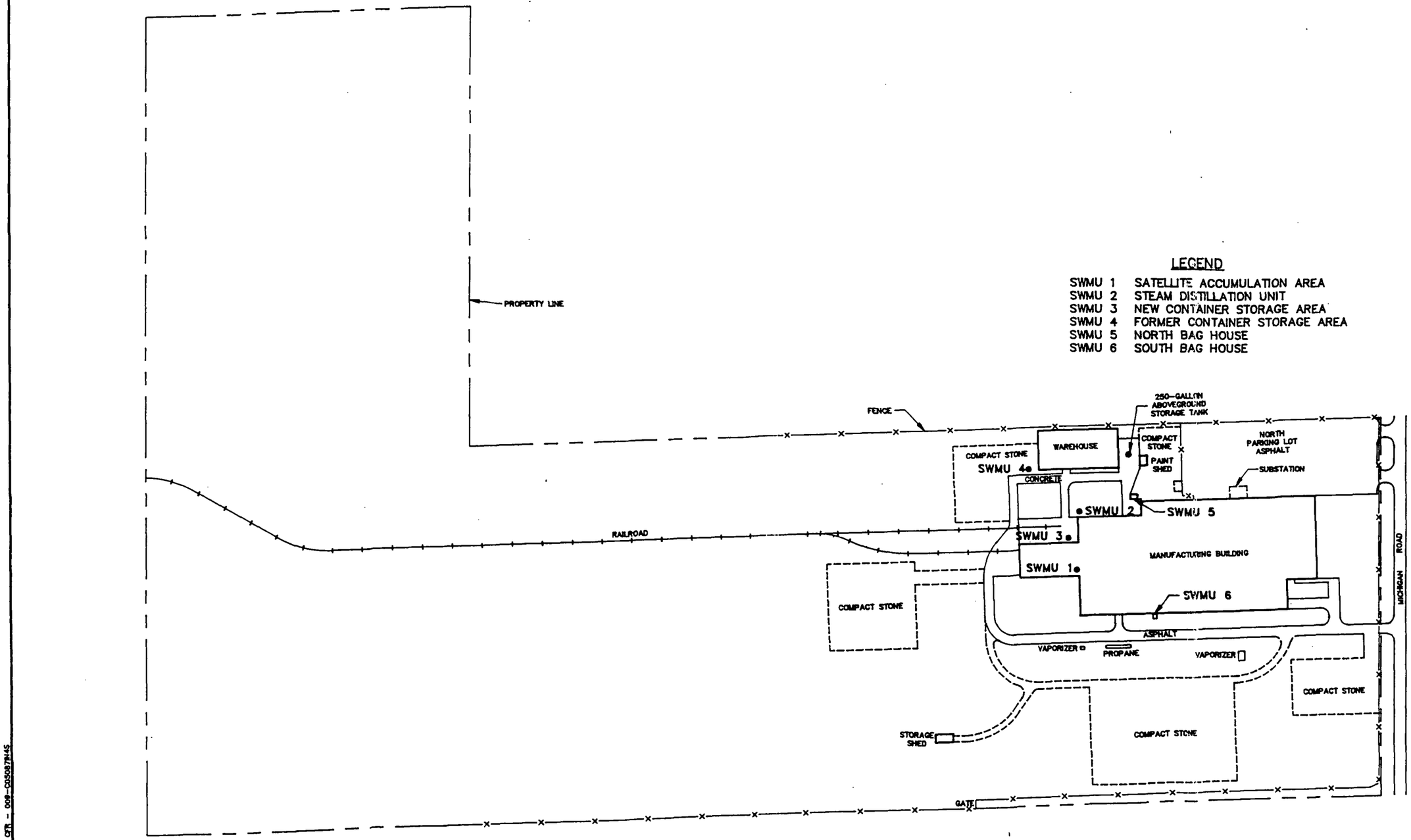
One 250-gallon aboveground storage tank (AST) containing gasoline was observed near the paint storage shed (see Photograph No. 1). Several 5-gallon pails containing unused paints were stored in the vicinity of the aboveground storage tank (see Photograph No. 1). A facility representative indicated that the unused paint in the 5-gallon pails is purchased by the employees of Envirex. Seven 55-gallon drums containing motor oil were observed on steel tank holders located to the west of the manufacturing area (see Photograph No. 2). They are reportedly used for maintenance purposes.

Prior to the construction of the facility in 1958, the land was used for agricultural purposes. The facility originally operated as Chainbelt Company. The facility changed its name to Rex Chainbelt Company in 1964, and then to Rexnord - Construction Machinery Division in 1973. In 1987, Banner Industries acquired the facility and changed its name to Rexnord, Inc. - Corporate Manufacturing. The facility changed its name to Envirex - Banner Industries in 1989. In 1990, Northwest Water Group PLC acquired the facility and changed its name to Envirex, Inc. (Envirex, 1992). Before 1990, the facility was primarily involved in fabrication of heavy steel equipment related to road construction and mining operations. Since 1990, the facility started manufacturing equipment related to wastewater treatment facilities, in addition to some road construction equipment.

2.3 WASTE GENERATION AND MANAGEMENT

Hazardous wastes generated at the facility include paint residue and thinner material wastes (F003, F005 and D001), still bottoms (F003, F005 and D001), spent solvents (F002 and D001), and paint filter wastes (F003, F005, and D001). Non-hazardous wastes generated at the facility include particulate emission wastes consisting of steel metal slag. The facility's waste streams are summarized in Table 2.

Paint residues and thinner material wastes (F003, F005, and D001) are generated during spray painting operations. These wastes generally contain xylene, acetone, ethyl benzene, n-butyl alcohol, toluene, methyl ethyl ketone, and methyl isobutyl ketone. These wastes are accumulated in Satellite Accumulation Area (SWMU 1) before being reclaimed on-site. Envirex reclaims toluene, the primary solvent, from the thinner material wastes by using an on-site Steam Distillation Unit (SWMU 2). SWMU 2 has been inactive since May 1992. According to a facility representative, SWMU 2 will be reactivated in August 1992 in a small on-site concrete block building in the same location. These wastes are currently being stored in the New Container



SOURCE: MODIFIED FROM ENVIREX, 1990

ENVIREX2.DWG - 06/14/92 - CFR - 009-035087R4S

ENVIREX, INC.
MADISON, INDIANA

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Paint Residue and Thinner Material Wastes/F003, F005, D001	Spray Painting Operations in Paint Booth Area	1, 2, and 3
Still Bottoms/F003, F005, and D001	Reclamation of Thinner Material Wastes	3
Spent Solvent Wastes/F002 and D001	Clean Up of Spray Painting Equipment	1 and 3
Spent Filter Wastes/F003, F005, and D001	Spray Painting Operations in Paint Booth Area	1 and 3
Particulate Emission Wastes/NA	Shot Blast Operations in Manufacturing Area	5 and 6

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

Storage Area (SWMU 3) and reclaimed off site by Safety-Kleen Corporation (EPA Identification No. KYD 981 027 469) of Lexington, Kentucky.

Still bottom wastes (F003, F005, and D001) generated during on-site toluene reclamation are stored in 55-gallon drums in the New Container Storage Area (SWMU 3). These wastes are transported to Safety-Kleen Corporation (EPA Identification No. KYD 981 027 469), Lexington, Kentucky for reclamation.

Spent solvent wastes (F002 and D001) are generated during the cleanup of spray painting equipment. These wastes are accumulated in 5-gallon pails in the Satellite Accumulation Area (SWMU 1), and stored in 55-gallon drums in the New Container Storage Area (SWMU 3) before being transported to Safety-Kleen Corporation (EPA Identification No. KYD 981 027 469) of Lexington, Kentucky for reclamation.

Spent filter wastes (F003, F005, and D001) generated during spray painting operations are accumulated in SWMU 1 and stored in 55-gallon drums in the New Container Storage Area (SWMU 3). These wastes are transported to Spring Grove Resource Recovery (OHD 000 816 629) of Cincinnati, Ohio for ultimate disposition.

Particulate emission wastes from shot blast operations are collected in the North Baghouse (SWMU 5) and South Baghouse (SWMU 6). These wastes contain nonhazardous steel metal slag. The ultimate disposition of these wastes is unknown.

All the wastes that are currently managed in the New Container Storage Area (SWMU 3) were previously managed in the Former Container Storage Area (SWMU 4). Envirex discontinued using SWMU 4 in 1989. This unit did not contain any hazardous wastes during the visual site inspection.

2.4 HISTORY OF DOCUMENTED RELEASES

There have been no documented releases to ground water, surface water, air, or on-site soils at the facility (Envirex, 1992).

2.5 REGULATORY HISTORY

Rexnord submitted a Notification of Hazardous Waste Activity form to EPA on July 15, 1980 (Rexnord, 1980a). In this notification, Rexnord reported that hazardous waste generation, treatment, storage, and disposal were taking place at the facility. Rexnord submitted a RCRA Part A permit application on August 16, 1980 (Rexnord, 1980b). This application listed container storage (S01) of 7,040 gallons of F017 wastes. In 1982, EPA delisted the F017 code. Rexnord resubmitted a Part A permit application on December 9, 1982. This application reclassified the wastes as F002 and F005 and listed an estimated 17,941 pounds each of these wastes per year (Rexnord, 1982). The S01 refers to the Former Container Storage Area, SWMU 4.

The facility closed its Former Container Storage Unit (SWMU 4) in 1988. On June 13, 1987, a closure plan was submitted by Rexnord to IDEM for review (IDEM, 1987b). Due to several deficiencies in the plan, IDEM requested that Rexnord resubmit the plan after all the deficiencies had been addressed (IDEM, 1987b). Rexnord submitted the revised closure plan on August 21, 1987 (Rexnord, 1987). On November 30, 1987, IDEM approved the revised closure plan (IDEM, 1987d). On August 3, 1988, IDEM acknowledged the closure of SWMU 4 (IDEM, 1988). After closure and Part A withdrawal, SWMU 4 was used for less-than-90-day storage of hazardous waste until 1989. The facility's current regulatory status is that of a large quantity generator of hazardous wastes.

An inspection conducted in 1987 by IDEM noted several RCRA compliance violations. The violations pertained to deficiencies involving improper management of hazardous waste containers, physical and chemical analysis of wastes, contingency plans, personnel training records, inspection schedules, notification of requirements under Part 265 and 122 to the new owner (during the ownership changes), and notification of change of ownership to IDEM (IDEM, 1987a). On September 20, 1987, IDEM reinspected the facility and determined that it was in compliance (IDEM 1987c).

The facility has two air permits. The air permits are held for paint spray booths that use dry filters, and shot blast operations that use two bag houses to control emissions. In March 1990, IDEM conducted an inspection of the facility's air emissions and determined that volatile organic compounds were being emitted at a higher rate than allowed by the permit. IDEM requested that Envirex submit an operation permit application that provided the actual emissions before IDEM would renew the permits (IDEM, 1990). Envirex submitted the application on March 30, 1990 and is waiting for IDEM's response. The facility has no history of odor complaints from area residents.

The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit for its stormwater and wastewater discharge. However, Envirex has an industrial wastewater discharge permit from the City of Madison Wastewater Treatment Plant. This permit allows Envirex to discharge sanitary and industrial wastewater, and stormwater (COM, 1992).

Envirex used one 5,000-gallon and two 1,000-gallon underground storage tanks (USTs) to store petroleum products such as gasoline, diesel fuel, and fuel oil. These tanks were located near the paint shed area. These USTs were removed in 1988. Reportedly, no contamination was observed during the tank removal operations. A facility representative indicated that Envirex submitted a report on tank removal operations to IDEM, and has not received any response as of this date. PRC did not find any information concerning the UST removal during the file reviews at IDEM office.

There has been no CERCLA activity at the site.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Jefferson County is midcontinental. The average daily temperature is 56 degrees Fahrenheit (° F). The lowest average daily temperature is 24° F in January. The highest average daily temperature is 88.1° F in July (USDA, 1985).

The total annual precipitation for the county is 42 inches. The mean annual lake evaporation for the area is about 36 inches. The 1-year 24-hour maximum rainfall is about 4 inches. The average seasonal snowfall is about 13 inches (USDA, 1985).

The prevailing wind is from the south. Average wind speed is highest in spring at 10 miles per hour (USDA, 1985).

2.6.2 Flood Plain and Surface Water

The facility is located within a 100 year floodplain (PRC, 1992c). The facility SWMUs are not designed to withstand a flood.

The nearest major surface water body, Big Clifty Creek, is located 1.5 miles southwest of the facility. Big Clifty Creek is used for recreation. Clifty Creek, is located 0.5-mile northwest of the facility, and is also used for recreation. Clifty Creek commingles with the Big Clifty Creek about 1 mile southwest of the facility. Several unnamed intermittent lakes and ponds were identified within 0.25-mile north and south of the facility. The Ohio River is located about 3 miles south of the facility, and is used for agricultural, commercial, industrial, recreation and public water supply.

Based on the regional topography, surface water drainage is towards the west. Stormwater and wastewater from the facility are discharged to the City of Madison Wastewater Treatment Plant.

2.6.3 Geology and Soils

The Envirex facility is located in the Till Plains region of the Central Lowlands physiographic province. Because most parts of the Central Lowlands were glaciated, there is an abundance of surface materials of glacial origin. Throughout much of the province, this glacial cover is underlain by gently dipping sedimentary beds of the Paleozoic age. The dominant Paleozoic rock types are sandstones, shales, limestones, conglomerates, and coal. Drainage in the Till Plains region is integrated, with the western part of the region being sufficiently eroded to be designated as a dissected plain (Pirkle and Yoho, 1982).

The facility is underlain by Cobbsfork silt loams soils. The Cobbsfork series consists of deep, poorly drained soils that are of low permeability. These soils are on glacial drift plains, and are formed in loess and in the underlying glacial drift. Slopes range from 0 to 2 percent (USDA, 1985). Available water capacity is very high in Cobbsfork soil. Surface runoff is very slow in cultivated areas. A perched, seasonally high water table is near or above the surface during a significant part of the year. Organic content is low in the surface layer (USDA, 1985).

PRC reviewed a drilling log obtained from IDNR for an off-site test well drilled within 0.5-mile of the facility. The drill log indicated yellow sandy clay soil in the top 27 feet, followed by brown and white limestone bedrock to a depth of 185 feet below the land surface (bls). Beneath the limestone bedrock, shale was observed to the bottom of the borehole, which is approximately 195 feet bls (IDNR, 1992).

2.6.4 Ground Water

The well referenced in Section 2.6.3 draws water from the Silurian dolomitic limestone and shaly bedrock material. Ground water was encountered in this well at a depth 22 feet bls. The production rate of this well, which was tested in 1984, was approximately 12.5 gallons per minute (IDNR, 1992). Ground-water flow direction in the shallow and bedrock aquifers is unknown. IDNR indicated that ground-water information for the Jefferson County is not available (PRC, 1992a). The city of Madison derives its public water supply from deep wells located along the Ohio River (PRC, 1992b).

2.7 RECEPTORS

The facility occupies 92 acres in an industrial, commercial, and residential area in Madison, Indiana. Madison has a population of about 19,000 (SFRA, 1991).

The facility is bordered on the north by Reliance Electrical Industries, on the west and south by undeveloped land, and on the east by residential and commercial properties. The nearest residential area is located about 0.25-mile northeast of the facility. The facility is secured by a 6-foot chain-link fence with three strands of barbed wire. This fence borders the facility on three sides.

The nearest major surface body, Big Clifty Creek, is located 1.5 miles southwest of the facility. Big Clifty Creek is used for recreation. Clifty Creek, is located 0.5-mile northwest of the facility, and is also used for recreation. Clifty Creek commingles with the Big Clifty Creek about 1 mile southwest of the facility. Several unnamed intermittent lakes and ponds were identified within 0.25-mile north and south of the facility. The Ohio River is located about 3 miles south of the facility, and is used for agricultural, commercial, industrial, recreation, and public water supply.

Ground water in the area is used as an industrial, agricultural, municipal, and private water supply. The city of Madison derives it public water supply from deep wells located along the Ohio River (PRC, 1992b). The nearest residential drinking water well is located 1-mile north of the facility. It is unknown if the well is upgradient or downgradient of the facility (USDA, 1985).

The facility is not located in a sensitive environment. The nearest sensitive environment, Clifty Falls State Park, is located 1.5 miles south of the facility (USGS, 1980). According to a

USDA representative, several small wetlands areas, less than 0.5 acres, are located within 3 miles of the facility (PRC, 1992c). The exact location of these areas was not determined.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the six SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1	**Satellite Accumulation Area**
Unit Description:	This unit is located near the paint booth area inside the manufacturing building. Wastes from spray painting and equipment cleanup operations are accumulated in sealed 5-gallon pails on wooden pallets in this unit prior to being transferred to the New Container Storage Area (SWMU 3).
Date of Startup:	This unit began operation in about 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages paint residue and thinner material wastes (F003, F005, and D001), spent solvents (F002 and D001), and spent paint filters (F003, F005 and D001) generated during spray painting and cleanup operations.
Release Controls:	This unit is located within a building with a concrete floor. No surface drains are located in the vicinity of this unit.
History of Documented Releases:	There have been no documented releases from this unit.
Observations:	During the inspection, PRC observed several 5-gallon pails containing F003, F005, and D001 wastes in this unit (see Photographs No. 3 to 5). These pails were sealed but were not labelled. PRC observed no evidence of releases from this unit.

SWMU 2	**Steam Distillation Unit**
Unit Description:	This unit was located on a concrete floor in an open area to the north of the manufacturing building. It was used to reclaim toluene from thinner material wastes. Toluene reclaimed from this unit was reused in spray painting operations. The capacity of this unit is unknown.
Date of Startup:	This unit began operation in about 1980.
Date of Closure:	This unit is currently inactive. The facility intends to reactivate this unit in August 1992.
Wastes Managed:	This unit managed F003, F005, and D001 wastes generated during spray painting operations. Still bottom wastes generated during reclamation were stored in the New Container Storage Area (SWMU 3). All the thinner material wastes are currently collected and reclaimed off site by Safety-Kleen Corporation (EPA Identification No. KYD 81 027 469) of Lexington, Kentucky.
Release Controls:	This unit had a concrete floor without secondary containment. No surface drains are located in the vicinity of this unit.
History of Documented Releases:	There have been no documented releases from this unit.
Observations:	During the inspection, the steam distillation unit was decommissioned. Envirex has constructed a small concrete block building to house this unit (see Photograph No 6). This unit measures approximately 8 feet by 8 feet, and has secondary containment. PRC observed no evidence of releases.
SWMU 3	**New Container Storage Area**
Unit Description:	This unit is located on a concrete floor in an open area to the west of the manufacturing building. This unit measured about 30 feet by 20 feet. Envirex stores all its hazardous wastes in this unit

	before transporting them to an off-site facility for ultimate disposition.
Date of Startup:	This unit began operation in about 1989.
Date of Closure:	This unit is active, and is used for less-than-90-day storage.
Wastes Managed:	This unit manages paint residue and thinner material wastes (F003, F005, and D001), still bottoms (F003, F005, and D001), spent solvent wastes (F002 and D001), and spent filter wastes (F003, F005, and D001) from spray painting, reclamation and cleanup operations. Spent filter wastes stored in this unit are transferred to Spring Grove Resource Recovery (EPA Identification No. OHD 000 816 629) of Cincinnati, Ohio, for ultimate disposition. All the other wastes are transported to Safety-Kleen Corporation (EPA Identification No. KYD 981 027 469) of Lexington, Kentucky for reclamation.
Release Controls:	This unit has a concrete floor, and has no secondary containment.
History of Documented Releases:	There have been no documented releases from this unit.
Observations:	During the inspection, PRC observed four, 55-gallon drums of spent filter wastes (F003, F005, and D001) stored in this unit. Furthermore, several empty drums were noted during the inspection. PRC observed no evidence of releases from this unit (see Photographs No. 7 and 8).
SWMU 4	**Former Container Storage Area**
Unit Description:	This unit was located on a concrete surface in an open area to the west of the warehouse. It measured about 50 feet by 10 feet.
Date of Startup:	This unit began operation in 1980.
Date of Closure:	This unit under went closure in 1988 and is currently inactive. IDEM approved closure in August 1988. This unit was used for

	less than 90 day storage after the closure. Envirex discontinued using this unit for hazardous waste storage in 1989.
Wastes Managed:	This unit managed F002, F003, F005, and D001 wastes generated during spray painting and cleanup operations. Currently this unit is not being used for waste storage.
Release Controls:	This unit had a concrete floor, and had no secondary containment.
History of Documented Releases:	There have been no documented releases from this unit.
Observations:	During the inspection, PRC observed no wastes being stored in this unit. PRC observed no evidence of releases.
SWMU 5	**North Baghouse**
Unit Description:	This unit is located on a paved area in the northern portion of the facility. All the filter bags were enclosed in a steel collector housing. The inlet is located at the top, and the outlet at the bottom. This unit is used for collection of particulate emission wastes from shot blast operations in the manufacturing area. These wastes are collected in 55-gallon drums from the outlet at the bottom.
Date of Startup:	This unit began operation in about 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous particulate emission wastes generated during shot blast operations. Particulate emissions contain steel metal slag.
Release Controls:	Particulate emission wastes in the air bags are collected in 55-gallon drums.
History of Documented Releases:	There have been no documented releases from this unit.

Observations:	During the inspection, PRC observed the collector housing in good condition. PRC observed no evidence of releases (see Photograph No. 9).
SWMU 6	**South Baghouse**
Unit Description:	This unit is located in the southern portion of the facility. All the filter bags were enclosed in a steel collector housing. The inlet is located at the top and the outlet at the bottom. This unit is used for collection of particulate emissions from shot blast operations in the manufacturing area. These wastes are collected in 55-gallon drums from the outlet at the bottom.
Date of Startup:	This unit began operation in about 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous particulate emission wastes generated during shot blast operations. Particulate emissions contain steel metal slag.
Release Controls:	Particulate emission wastes in the air bags are collected in 55-gallon drums.
History of Documented Releases:	There have been no documented releases from this unit.
Observations:	During the inspection, PRC observed the collector housing in good condition. PRC observed no evidence of releases.

4.0 AREAS OF CONCERN

PRC identified an AOC at the facility. This AOC is discussed below; its location is shown on Figure 2.

AOC 1 Underground Storage Tanks

Envirex used one 5,000 gallon and two 1,000-gallon underground storage tanks (USTs) to store petroleum products such as gasoline, diesel fuel, and fuel oil. These USTs were removed in 1988. According to a facility representative, no contamination was observed during the tank removal operations. Also, the representative indicated that Envirex submitted a report on tank removal operations to IDEM, and has not received any response as of this date. PRC did not find any information concerning the UST removal during the file reviews at IDEM office.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified six SWMUs and an AOC at the Envirex facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 **Satellite Accumulation Area**

Conclusions: This unit does not pose a significant threat of release to the environment. Residual wastes are contained in 5-gallon pails that are sealed and located inside the building. No spills or releases were observed or have been documented for this unit. The residual wastes are not expected to migrate through the concrete floor. The potential for release from this unit to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action at this time.

SWMU 2 **Steam Distillation Unit**

Conclusions: This unit does not pose a potential threat of release to the environment. This unit is currently inactive, and will be reactivated in August 1992. This unit was previously located in an open area. Envirex has constructed a concrete block building to house this unit. No spills or releases were observed or have been documented for this unit. The potential for release from this unit to the ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action at this time.

SWMU 3 **New Container Storage Area**

Conclusions: This unit does not pose a significant threat of release to the environment. Residual wastes are contained in 55-gallon drums that are sealed and stored on a concrete surface in an open area. No spills or releases were observed or have been documented for this unit. This unit does not contain any secondary containment. The potential for release from this unit to on-site soils is low to moderate, and to ground water, surface water, and air is low.

Recommendations: PRC recommends that the facility install secondary containment for this unit to prevent potential release to the on-site soils.

SWMU 4 **Former Container Storage Area**

Conclusions: This unit does not pose a significant threat of release to the environment. This unit under went closure in 1988, and IDEM approved the closure in 1988. This unit was used for less than 90 day storage until 1989. This unit is currently inactive. No residual wastes are being stored in this unit. No spills or releases were observed or have been documented for this unit. The potential for release from this unit to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action at this time.

SWMU 5 **North Baghouse**

Conclusions: This unit does not pose a significant threat of release to the environment. No spills or releases were observed or have been documented for this unit. The potential for release from this unit to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action at this time.

SWMU 6 **South Baghouse**

Conclusions: This unit does not pose a significant threat of release to the environment. No spills or releases were observed or have been documented for this unit. The potential for release from this unit to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action at this time.

AOC 1 **Underground Storage Tanks**

Conclusions: A facility representative indicated that no contamination was observed during tank removal operations. Envirex submitted a tank removal report and has not received any response from IDEM; however, PRC did not find the report during the file review. Based on the information obtained from facility representatives, the potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations: PRC recommends that Envirex follow-up and obtain a response from IDEM as to whether further action is required.

TABLE 3

SWMU AND AOC SUMMARY

	SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Satellite Accumulation Area	1980-present	None	None
2.	Steam Distillation Unit	1980-1992 Will be reactivated in August 1992	None	None
3.	New Container Storage Area	1989-present	None	Install secondary containment
4.	Former Container Storage Area	1980-1989	None	None
5.	North Baghouse	1980-present	None	None
6.	South Baghouse	1980-present	None	None

	AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Underground Storage Tanks	Unknown-1988	None	Follow up with IDEM and obtain a response as to whether further action is required

REFERENCES

City of Madison Water and Sewage Department (COM), 1992, Industrial Wastewater Discharge Permit. January 2.

Envirex, Inc. (Envirex), 1992, Information on Facility Operations and Waste Management, June 17.

Indiana Department of Environmental Management (IDEM), 1987a, Letter from David D. Lamm, IDEM, to Donald Riley, Envirex Indicating the Violations Documented During the Interim Status Inspection, April 28.

IDEM, 1987b, Letter from Terry F. Gray, IDEM, to Donald Riley, Rexnord pertaining to the deficiencies in the closure plan submitted by Rexnord on June 13, 1987, July 20.

IDEM, 1987c, Letter from Jane Magee, IDEM, to Donald Riley Acknowledging the Compliance of the Facility with the Terms of the Notice of Violation dated April 28, 1987, September 30.

IDEM, 1987d, Letter from Jane Magee, IDEM, to Donald Riley, Rexnord in Reference to Closure Plan Approval, November 30.

IDEM, 1988, Letter from Jane Magee to Tom Nichols, Rexnord Approving the Closure of Hazardous Waste Storage Area, August 3.

IDEM, 1990, Letter from John L. Doss, IDEM, to Donald Riley, Envirex Concerning Air Pollution Permit Status, March 19.

Indiana Department of Natural Resources (IDNR), 1992, Water Well Records for Section 14, 15, 22 and 26, of T 4 N, and R 10 E.

Pirkle, E.C., and W.H. Yoho, (Pirkle and Yoho), 1982, Natural Landscapes of the United States, Kendall/Hunt Publishing Company, Dubuque, Iowa.

PRC, 1992a, Telephone Conversation with an Indiana Department of Natural Resources personnel Concerning the Ground-water Information for Jefferson County, Indiana.

PRC, 1992b, Telephone Conversation with a City of Madison Water and Sewage Department personnel regarding the city water supply source.

PRC, 1992c, Telephone Conversation with an U.S. Department of Agriculture, Soil Conservation Services of Hanover, Indiana personnel regarding the sensitive environment and floodplain areas.

Rexnord, Inc. (Rexnord), 1980, Hazardous Waste Activity Notification Form, July 15.

Rexnord, 1980, RCRA Part A Permit Application, August 16.

Rexnord, 1982, RCRA Part A Permit Application, December 9.

Rexnord 1987, Revised Closure Plan for the Hazardous Waste Storage Area, August 21.

State Farm Road Atlas (SFRA), 1991.

U.S. Department of Agriculture (USDA), 1985, Soil Conservation Services, Soil Survey of Jefferson County, Indiana.

U.S. Geological Survey (USGS), 1980, Topographic Map of Clifty Falls Quadrangle.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IN	IND 006 374 722

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
Envirex, Inc.	2753 Michigan Road				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Madison	IN	47250	Jefferson		
09 COORDINATES: LATITUDE	**LONGITUDE**				
38° 45' 00" N	85° 22' 30" W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

The facility is located about 0.5 mile north of State Highway 62 and N. Michigan Road; State Highway 62 can be accessed from Interstate 65 North through an exit at Louisville

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
Envirex, Inc.	2753 Michigan Road		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Madison	IN	47250	(812) 273-1484
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**

13 TYPE OF OWNERSHIP *(Check one)*

☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency Name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

■ A. RCRA 3010 DATE RECEIVED: 07 / 15 / 80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___ / ___ / ___ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION BY *(Check all that apply)*

☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR

☒ YES DATE 06/17/92 ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

☐ NO

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*

☐ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN

03 YEARS OF OPERATION

1958 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Hazardous and nonhazardous wastes generated during facility operations. Hazardous wastes (F002, F003, F005, and D001) are generated during spray painting operations. Nonhazardous particulate matter emission wastes are generated during shot blast operations.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The facility does not pose a significant threat to surrounding environment. The potential for release to ground water, surface water, or air is low. The potential for release to on-site soils is low to moderate.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

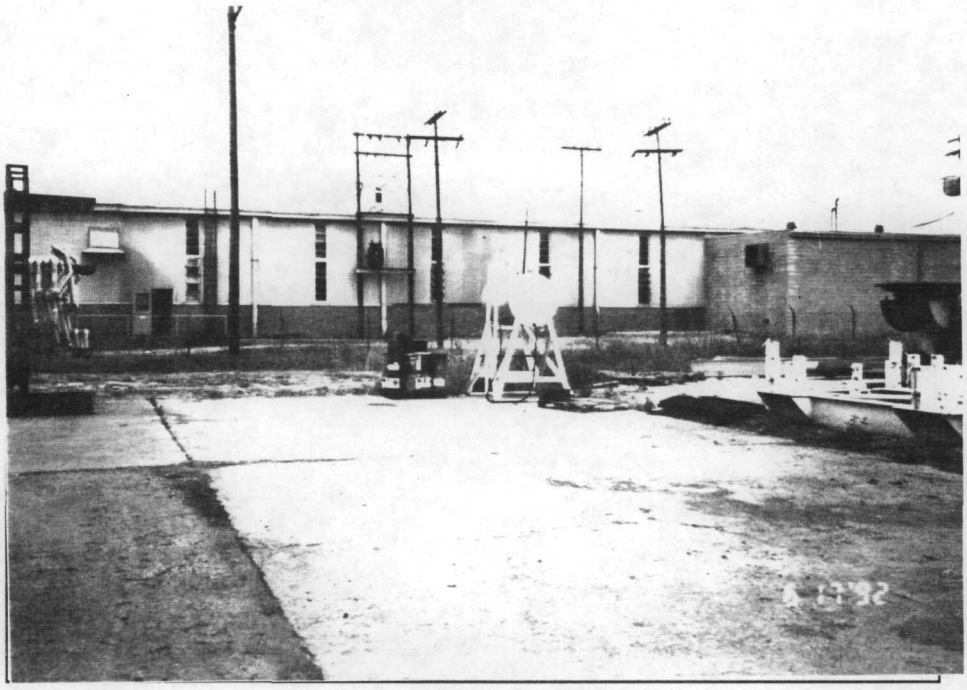
01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
Seshu Kulkarni		PRC	(615) 256-1191	06 / 17 / 92 (MONTH DAY YEAR)

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

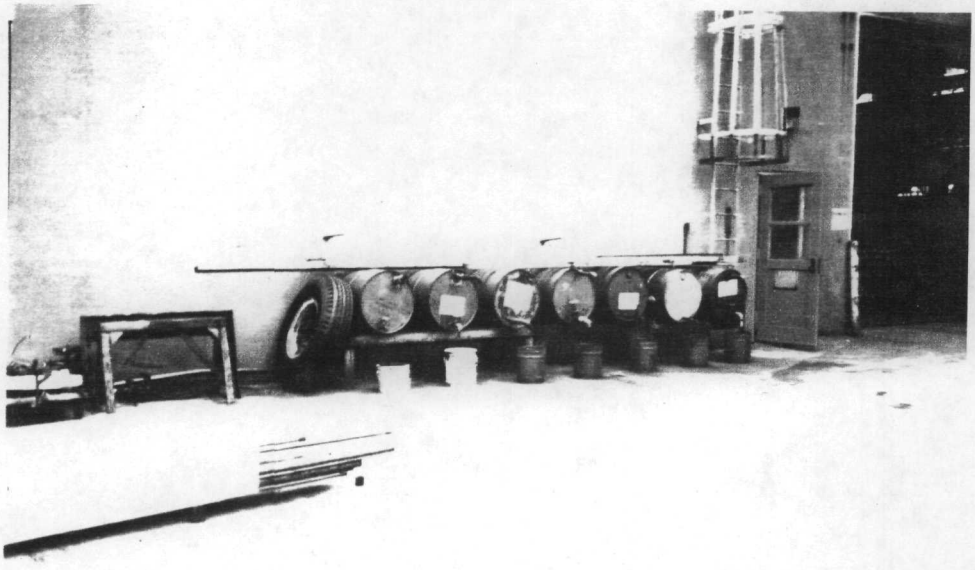
VISUAL SITE INSPECTION SUMMARY

Envirex Inc.
2753 Michigan Road
Madison, Indiana 47250
IND 006 374 722

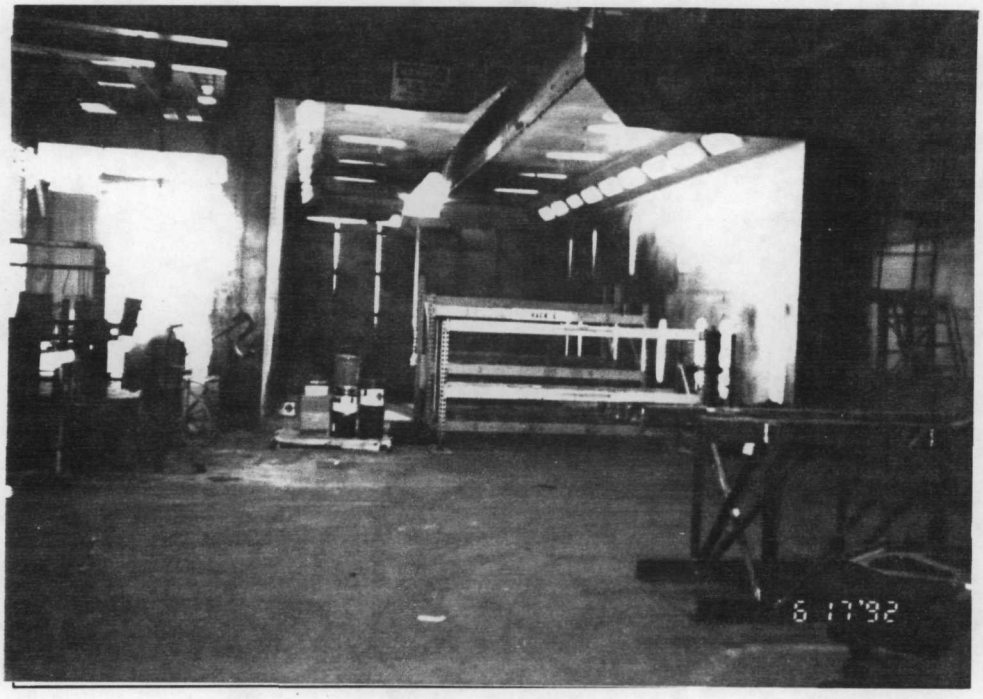
Date:	June 17, 1992
Primary Facility Representative: Representative Telephone No.:	Donald Riley, Manager of Safety and Tooling Division 812/273-1484
Inspection Team:	Seshu Kulkarni, PRC Environmental Management, Inc. Brad Slaymaker, PRC Environmental Management, Inc.
Photographer:	Seshu Kulkarni
Weather Conditions:	Sunny, 85° F, Winds from the south.
Summary of Activities:	The visual site inspection (VSI) began at 10:30 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of the requested documents. The VSI tour began at 10:45 a.m. The tour concluded at 12:00 noon, after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 12:10 p.m.



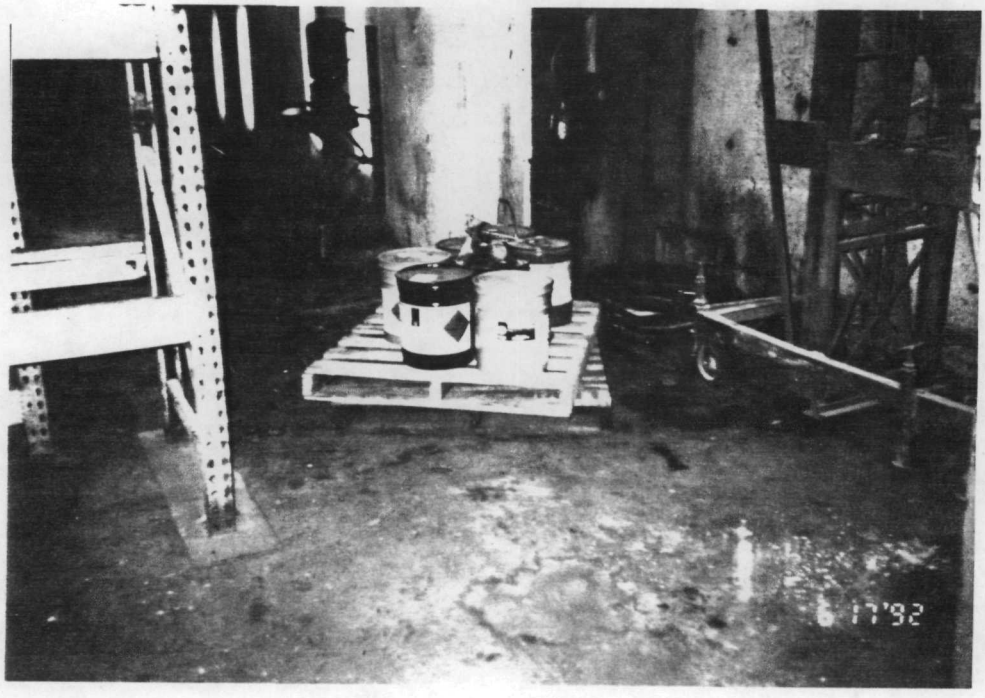
Photograph No. 1 Location: Paint Shed
Orientation: South Date: June 17, 1992
Description: This photograph shows the location of the 250-gallon aboveground storage tank and unused paint in 5-gallon pails. Historically, Envirex had three underground storage tanks in this location. They were removed in 1988.



Photograph No. 2 Location: West of the manufacturing building
Orientation: East Date: June 17, 1992
Description: This photograph shows seven 55-gallon drums used to store motor oil for maintenance purposes.

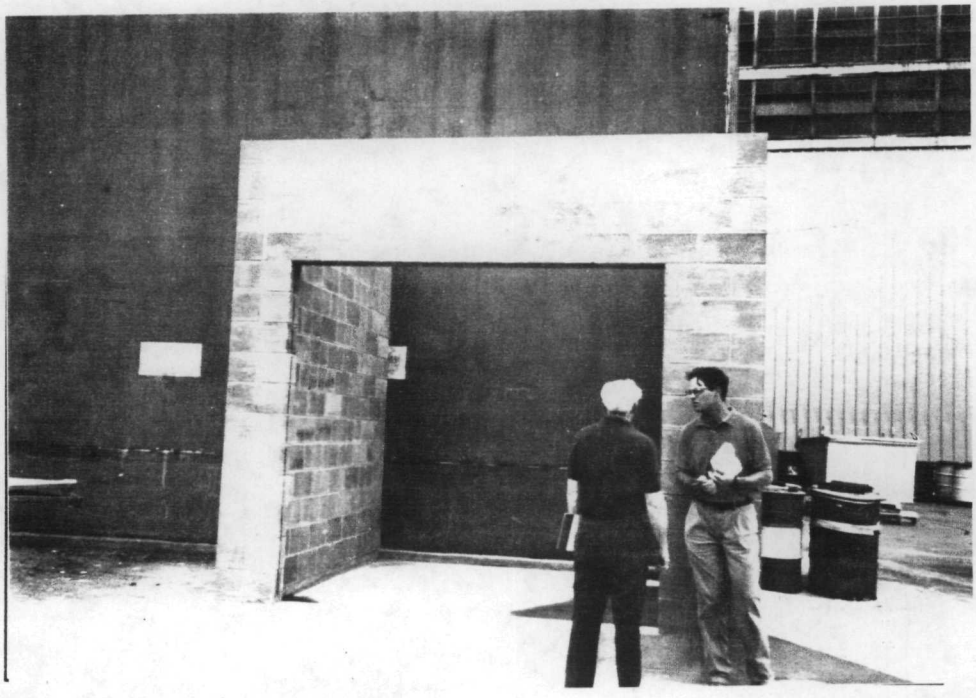


Photograph No. 3 Location: SWMU 1
Orientation: West Date: June 17, 1992
Description: This photograph shows paint residue and thinner material wastes accumulated in 5-gallon pails in the paint booth area.



Photograph No. 4 Location: SWMU 1
Orientation: West Date: June 17, 1992
Description: This photograph shows paint residue and thinner material wastes accumulated in 5-gallon pails in the paint booth area.

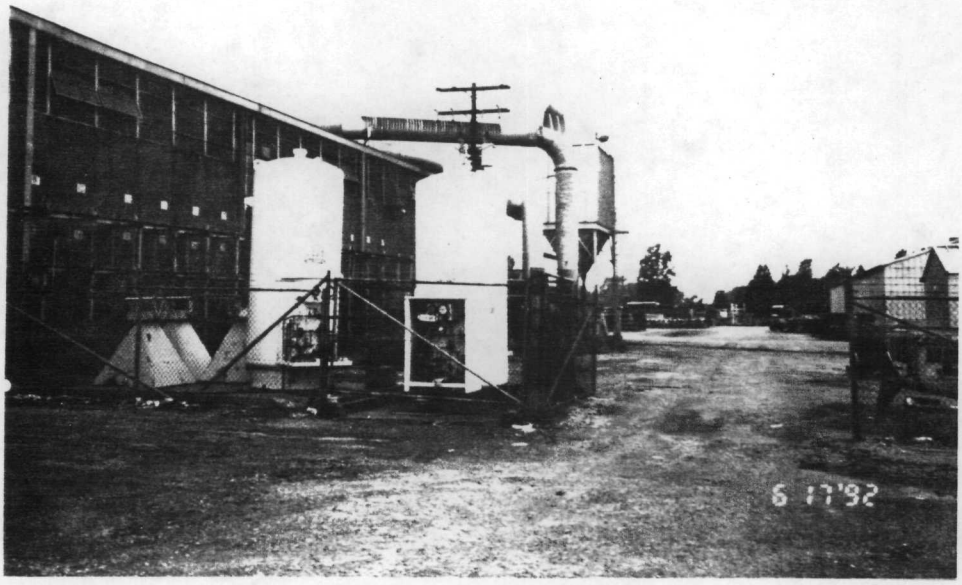
Photograph No. 5 Location: SWMU 1
Orientation: West Date: June 17, 1992
Description: This photograph shows paint residue and thinner material wastes accumulated in 5-gallon pails in the paint booth area.



Photograph No. 6 Location: SWMU 2
Orientation: South Date: June 17, 1992
Description: This photograph shows newly constructed concrete block building for housing the steam distillation unit.

Photograph No. 7 Location: SWMU 3
Orientation: East Date: June 17, 1992
Description: This photograph shows reclaimed toluene and hazardous waste storage area.

Photograph No. 8 Location: SWMU 3
Orientation: South Date: June 17, 1992
Description Spent filters from painting booths are compacted in 55-gallon drums and stored in this unit. The four drums to the extreme left contain this waste. The remaining drums were empty.



Photograph No. 9
Orientation: West
Description: This photograph shows the North Baghouse.

Location: SWMU 5
Date: June 17, 1992

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

Rexnord/Envirex 129

June 17, 1992

1045 - meeting with Bob Riley.
Walk outside. 92 acre
facility fenced.

Note baghouse for dust
& particulates.

Metal shed for paint storage

Aboveground 250 gal tank
- converting to propane.

USTs - gone 4 yrs
(1) 5000 (2) 1000

R. Reynolds 6-30-92

130

used paint stored in metal containers on pallet beside above ground tank.

7 55 gallon oil tanks used for maintenance against side of building. On steel holders - tanks lay sideways.

Storage drum area - thinner paints, filters 1973

Land sometimes used for crops & cattle.

Coal tar based paints used for underwater protection.

B. Stapleton 6-30-92

131

Began 1958

west - Fields (farm)

north - reliance electric, Hobart

south - commercial

east - apartments, restaurant, church

Bay 5 under remediation - walls, electric - for fiberglass production materials.

Bay 4 has paint booth.

Storage of some paints 1/2 gallon buckets - in metal cabinet.

B. Stapleton 6-30-92

Plastic co-strip used to clean chains - 20 gallon containers

Building new paint booths converting from old one in Bay 5 to new one.

Bay 3 - 30 yr old booth coming down - still being used.

Bay 4 - small booth open 5 gallon cans of ten paint noted.

111 Trichloroethane 55-gal drum noted. Used for cleaning

B. Stepanek 6-30-92

2 shifts production

1 maintenance 24 hr.

closed sat.; sun.

155 employees

Distillation discontinued 1 month ago. Now ship waste paint drums to reclaim toluene.

Filters shipped off-site for incineration.

Paint operation - physical exam charcoal air filters

B. Stepanek 6-30-92

150 ENVIREX, Inc

2753 Michigan Rd
Madison, Indiana

Inspection Team: Brad Slaymaker
Seshu Kulkarni

Date: 06/17/92

Borders: State Road #62 ~~South~~ Commercial
Michigan Road — East
Across Commercial ~~North~~ St
Vacant Lots — West + West
Industrial Commercial — North
Reliance Electric

10-4pm Reclaim toluene, using
Steam Distillation on, site

# of employees — 155

M Cullum 06/17/92

151

Moved distillation unit
Constructing a building to
house distillation unit.
~~Picture 26 frame 1~~ West
Air bag / dust collector
Paint storage Area
~~Picture 27 Frame 1~~
~~#~~ USTs Above ground Storage
tank.
Several pails on a pallet

Seven waste oil drums
Warehouse — used for
hardware Storage
~~Picture 28, frame 1~~
Still bottoms picked
up by Safety Klean

M Cullum 06/17/92

Filters go to Cecos
Solvent wastes are
reclaimed onsite -
Ship a max of 18-23 drums
24 hazardous waste
drums stored behind
the production Area

11:08 Western portion of the
facility is an open
area, not being
used

Frame 1 Picture 1 west - warehouse
" 2 Air bag - West
" 3 AST - NE
" 4 Material drums E
" 5 Reclaimed Toluene drums

1 AST for ... S. Hullcam 06/17/92 * drum

Frame 1
Picture 6 → Hazardous waste storage
South, no berm, sloping
towards ~~east~~ west
Frame 1
Picture 7 → Factory Area East
Frame 1
Picture 8 - Paint Booth Area
West
Frame 1
Picture 9 - Near Paint Booth Area
Pails stored on
pallets (8 pails) west
Frame 1
Picture 10 → Near Paint Booth Area
west, pails on pallets
Frame 1
Picture 11 → Factory Area, East
Picture 12 → South, New Distribution Bldg

S. Hullcam 06/17/92

11:45 Distillation unit is
currently not in use
The Chutron is
relocating the unit
on a Special Bldg
to house the unit

12:00 operators wear respirators
during painting operation

Completed VSI
at 12:12 pm
Had a exit meeting
and discharge
June 17 '91